

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING
SERVICES, LLC, VITOL US HOLDING II
CO., VITOL VIRGIN ISLANDS CORP,
ANDREW CANNING, OPTIS EUROPE,
LTD., VTTI, and VITOL, INC.,

Defendants.

CASE NO. 1:21-CV-00312

BREACH OF CONTRACT

JURY TRIAL DEMANDED

**NOTICE OF CROSS 30(B)(6) DEPOSITION OF MATT JENSEN AS THE
REPRESENTATIVE OF ACUREN INSPECTION SERVICES**

TO: Glenda L. Lake, Clerk of the Court
District Court of the V.I.

Alex Kaplan, Esq.
Y. Gloria Park, Esq.
Susman Godfrey, Esq.
1000 Louisiana St., Suite 5100
Houston, TX 77002
Email Address: akaplan@susmangodfrey.com; GPark@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Email Address: asimpson@coralbrief.com
Attorney For: Andrew Canning

Carl A. Beckstedt, III, Esq.
Beckstedt & Kuczynski LLP
2162 Church Street
Christiansted, USVI 00820

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312
NOTICE OF CROSS 30 (B)(6) DEPOSITION OF MATT JENSEN AS THE REPRESENTATIVE OF ACUREN INSPECTION SERVICES
Page 2

Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com;
gspark@susmanodfrey.com; akaplan@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, LLC
The Tunick Building, Suite 201
1336 Beltjen Road
St. Thomas, VI 00802
Email Address: simone.francis@ogletreedeakins.com
Attorney For: Island Project and Operating Services, LLC

Susan C. Nissman-Coursey
Caribbean Scribes, Inc.,
1244 Queen Cross Street, Suite 1A,
Christiansted, VI 00820
Email Address: scoursey27@gmail.com; susan@caribbeanscribes.com

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6),
Plaintiff **PETRO INDUSTRIAL SOLUTIONS, LLC**, by and through undersigned counsel,
will take the oral examination of **MATT JENSEN as the Representative of ACUREN
INSPECTION SERVICES**. Defendant shall designate one or more officers, directors or
managing agents who are competent to testify on the company's behalf.

That person(s) who is designated to testify on Defendant's behalf should have
knowledge of, but not be limited to, the following:

1. The contractual relationship between the Plaintiff and Acuren Inspection Services.
2. Acuren Inspection Services' knowledge as to how to certify welders.
3. Acuren Inspection Services' knowledge as to how to recertify welders who have
been previously certified and continued to work for a company.
4. ASME requirements as to listing welders.

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312
NOTICE OF CROSS 30 (B)(6) DEPOSITION OF MATT JENSEN AS THE REPRESENTATIVE OF ACUREN INSPECTION SERVICES
Page 3

5. The scope and results of Versa Integrity Group's listing of Petro's work on the 3" vent line at the Vitol Propane Terminal as hired by Petro.
6. The request by IPOS, VTTI, or Vitol to retest the Petro welds, the scope of that listing, the results, and whether the welds as a whole passed the ASME standards for approval of the work.
7. Who hired Versa Integrity Group to test the WPA 3" Rent Line welds after Petro had Versa test them, the amount billed, who were the primary persons reported to, and the cost of the work?
8. Who actually was in charge of the work for Versa Integrity Group on the second contract to list the 3" vent line?
9. Acuren Inspection Services' knowledge of Guillermo Castro.

This deposition will take place on **July 28, 2023, at 1:00 PM**, at **via Zoom**, before any Notary Public commissioned by the Territory of the US Virgin Islands or other person qualified to administer the oath and take deposition.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: July 26, 2023

BY: /s/ Lee J. Rohn
Lee J. Rohn, Esquire
VI Bar No. 52
1108 King Street, Suite 3 (mailing)
56 King Street, Third Floor (physical)
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
lee@rohnlaw.com

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312
NOTICE OF CROSS 30 (B)(6) DEPOSITION OF MATT JENSEN AS THE REPRESENTATIVE OF ACUREN INSPECTION SERVICES
Page 4

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on July 26, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Alex Kaplan, Esq.
Y. Gloria Park, Esq.
Susman Godfrey
1000 Louisiana St., Suite 5100
Houston, TX 77002
Email Address: akaplan@susmangodfrey.com; GPark@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Email Address: asimpson@coralbrief.com
Attorney For: Andrew Canning

Carl A. Beckstedt, III, Esq.
Beckstedt & Kuczynski LLP
2162 Church Street
Christiansted, USVI 00820
Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com;
gspark@susmanodfrey.com; akaplan@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, LLC
The Tunick Building, Suite 201
1336 Beltjen Road
St. Thomas, VI 00802
Email Address: simone.francis@ogletreedeakins.com
Attorney For: Island Project and Operating Services, LLC

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312
NOTICE OF CROSS 30 (B)(6) DEPOSITION OF MATT JENSEN AS THE REPRESENTATIVE OF ACUREN INSPECTION SERVICES
Page 5

I also caused a true and correct copy of the foregoing to be served via electronic mail upon the following:

Susan C. Nissman-Coursey
Caribbean Scribes, Inc.,
1244 Queen Cross Street, Suite 1A,
Christiansted, VI 00820
Email Address: scoursey27@gmail.com; susan@caribbeanscribes.com

BY: /s/ Lee J. Rohr (kj)